



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

T. Marvel

Mary A. Gade, Director
217/524-3300

2200 Churchill Road, Springfield, IL 62794-9276

February 18, 1994

Clark Oil and Refining Corporation
Attn: Mr. John T. Bernbom
131st Street and Kedzie Avenue
Post Office Box 297
Blue Island, Illinois 60406

RECEIVED
WMD RECORD CENTER

JUN 02 1994

Re: 0310240005 -- Cook County
Clark Oil and Refining
ILD005109822
Log No.: C-605, A-455
RCRA Closure

Dear Mr. Bernbom:

This is in response to the certification of closure submitted by Clark Oil and Refining for the hazardous waste container storage unit at the above-referenced facility. This certification, signed by a representative of the owner/operator, Clark Oil and Refining and an independent registered professional engineer, John Polich, P.E., indicated that the subject hazardous waste container storage unit has been closed in accordance with the plan approved by the Agency on December 21, 1992 which was modified, the latest modification being approved by the Agency on March 23, 1993.

The subject hazardous waste management unit was inspected by a representative of this Agency on December 3, 1993. The inspection revealed that the unit was closed in accordance with the approved closure plan. In addition, a review of the closure certification and accompanying closure documentation report also indicates that the unit was closed in accordance with the approved closure plan. Therefore, the Agency has determined that closure of the hazardous waste container storage unit at the above-referenced facility has apparently met the requirements of 35 IAC 725.

In addition to reviewing the closure certification, the Agency has reexamined the information submitted on March 4, 1992 and May 12, 1992 concerning withdrawal of the above-referenced Part A application. Given that the subject hazardous waste container storage area has been closed in accordance with 35 IAC 725, the Agency is hereby withdrawing your Part A permit application dated November 17, 1980 and signed by Richard P. Nelson, Vice President - Manufacturing.

As a result of completing closure of the subject hazardous waste container storage area, this facility must continue to meet the requirements of 35 IAC 722: Standards Applicable to Generators of Hazardous Waste and 35 IAC 728: Land Disposal Restrictions.

Clark Oil and Refining / Blue Island, IL
Page 2

Should you have any questions regarding this matter, please
contact Michael A. Heaton at 217/524-3312.

Sincerely,



Douglas W. Clay, P.E.
Hazardous Waste Branch Manager
Permit Section, Bureau of Land

DWC:mah
JLM

cc: USEPA Region V -- Lorraine Kosik
Ronald Snook -- Clark Oil and Refining
USEPA Region V -- George Hamper

bcc: Bureau File
Maywood Region
Andy Vollmer
Jim Moore
Mike Heaton
Todd Marvel

CLARK OIL & REFINING CORPORATION



131ST AND KEDZIE AVENUE
POST OFFICE BOX 297
BLUE ISLAND, ILLINOIS 60406-0297
OFFICE: (708) 385-5000
FAX: (708) 385-0781

April 19, 1993

Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

Re: Modification
Notification of Regulated Waste Activity
Clark Oil & Refining Corporation
Blue Island, Illinois 60406
USEPA ID Number: ILD 005-109-822
IEPA ID Number: 0310240005

Division of Land Pollution Control:

Please find attached a completed "Notification of Regulated Waste Activity" form. This form is being submitted in order to notify the IEPA of the additional hazardous wastes generated at Clark Oil & Refining Corporation's Blue Island Refinery.

If you have any questions, please do not hesitate to contact me.

Sincerely yours,

CLARK OIL & REFINING CORPORATION

Ronald Snook
Environmental Specialist

dlg

Attachments

RECEIVED
APR 21 1993
IEPA/DLPC

C-605-M-1
cc: May/1993

Clark Oil & Refining Corp.

Blue Island Refinery
131st & Kedzie Avenue
Blue Island, IL 60406
708/385-5000

August 4, 1993



Mike,
If CORE ruled
on this, let's go
ahead & get letter
out by 8/20
if possible.

Mr. Larry Eastep
Illinois Environmental Protection Agency
Division of Land Pollution Control
P.O. Box 19276
2200 Churchill Road
Springfield, IL 62794-9276

RECEIVED

AUG 09 1993

IEPA - BOL
PERMIT SECTION

Re: 0310240005 -- Cook County
Clark Oil & Refining Corporation -- Blue Island Refinery
ILD 005109822
Log No. C-605-M-1
RCRA -- Closure

Dear Mr. Eastep:

This letter is to confirm a telephone conversation on August 3, 1993 with Mr. Michael Heaton, representing IEPA, and me. The subject of the conversation was Clark Oil's closure of the alleged S01 storage facility.

The last IEPA correspondence received was dated March 23, 1993. This letter set forth the clean-up objectives for the closure of the alleged S01 storage site and stated the closure activities must be completed by October 1, 1993. It is now my understanding from Mr. Heaton that IEPA's CORE will independently reevaluate Clark Oil's situation. Until the CORE reaches a decision, Clark Oil is not required to perform any further action concerning the alleged S01 site. The CORE is expected to make their decision during the month of September, 1993.

It is understood that the schedule for closure activities set forth in your March 23, 1993 letter will be extended to reflect CORE's decision. Clark Oil still reserves the right of appeal if the CORE's decision is determined unreasonable.



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

217/524-3300

2200 Churchill Road, Springfield, IL 62794-9276

September 29, 1992

Clark Oil and Refining Corporation
Attn: Mr. John T. Bernbom
131st Street and Kedzie Avenue
Post Office Box 297
Blue Island, Illinois 60406

Re: 0310240005 -- Cook County
Clark Oil and Refining Corporation
ILD005109822
Log No. C-605
Received: July 31, 1992
RCRA-Closure

Dear Mr. Bernbom:

The closure plan prepared and submitted by Gabriel Laboratories, Ltd. has been reviewed by this Agency. Your partial closure plan to close the hazardous waste container storage (S01) unit at the above-referenced facility is hereby approved subject to the following conditions and modifications.

1. The unit undergoing closure is classified by the IEPA as a hazardous waste container storage (S01) unit, not a T04 unit as the above-referenced closure document refers to it. The container (the roll-off box meets the definition of "container" as defined by 35 IAC 720.110), during the period in question and was used only for storage. Therefore it is a hazardous waste container storage (S01) unit.

Additionally, since the unit is not listed on the Part A application dated November 17, 1980, and signed by Richard P. Nelson, Vice President - Manufacturing, the closure of this unit and the withdrawal of the Part A application are two separate issues. Comments pertaining to the withdrawal of the Part A application are included as Condition 14 below.

2. Closure activities must be completed by April 1, 1993. When closure is complete the owner or operator must submit to the Agency certification, both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification must be received at this Agency within sixty (60) days after closure, or by June 1, 1993. These dates may be revised pending review of the submittal required by Condition 7 below.

Facility No.: 0310240005
Public Notice No.: 91038

Date: November 4, 1991

NOTICE OF CLOSURE
CLOSURE NO. 605

A plan to close the Clark Oil and Refining Corporation's hazardous waste storage unit located in Blue Island, Illinois, has been submitted to the Illinois Environmental Protection Agency (IEPA) pursuant to Subpart G of 35 Ill. Adm. Code 725. The main activity of Clark Oil and Refining is to convert crude petroleum oil into gasoline and liquid heating fuels. The hazardous wastes from this process are stored in a steel roll-off box. This facility will continue to operate at this location during and following closure of the hazardous waste unit described in this notice.

At this time the IEPA is also requesting that the facility provide information concerning any prior release of hazardous waste constituents from any solid waste management facility on the site.

Within 30 days of the first publication date of this notice, interested persons are invited to submit written comments on the plan or request modifications of the plan, or provide information on the release, at any time, of hazardous waste constituents from the facility. Written comments must be addressed to IEPA Government and Community Affairs, Attn: Jean Kessinger, 2200 Churchill Road, P. O. Box 19276, Springfield, Illinois 62794-9276, telephone number 217/782-5562.

(MORE)

The site must be closed in accordance with the standards set forth in the Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2 Pars. 1001 et seq., and regulations adopted thereunder.

The proposed closure plan, closure performance requirements, and other documents are available for inspection and may be copied at the IEPA's Springfield headquarters. There is no charge for the first 400 pages copied. There is a 25 cents charge for each page copied over 400.

400. An appointment to inspect the proposed closure plan must be made in advance by contacting the Division of Land Pollution Control, Freedom of Information Act (FOIA) coordinator at 2200 Churchill Road, P. O. Box 19276, Springfield, Illinois 62794-9276, at telephone number 217/782-6760. Please refer to the closure number under the heading at the top of this advertisement when contacting the FOIA coordinator.

In response to requests or at the discretion of the IEPA, a public hearing may be held to clarify one or more issues concerning the closure plan. Public notice will be issued 30 days before any public hearing.

XXX

304



CLARK OIL & REFINING CORPORATION

131st and Kedzie Avenue
Post Office Box 297
Blue Island, Illinois 60406
(708) 385-5000
FAX (708) 385-0781

*0310240005 - Cook County
Clark Oil Refining Corp.
ILDOC 510-1822
Compliance File*

February 7, 1990

Angela Aye Tin, Manager
Technical Compliance Unit
Compliance Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road, P.O. Box 19276
Springfield, Illinois 62794

Re: Notice of Noncompliance

Dear Ms. Tin:

Enclosed please find a Closure Plan discussed at our recent meeting concerning the above matter. This is submitted according to our agreement in order to comply with the enforcement position of the Illinois EPA. Clark has difficulty in "closing" the site since there is no information that the site was ever open since the term of storage is presently unknown and cannot be determined.

Clark is seeking to resolve this matter with the United States EPA. Clark is also considering a Pollution Control Board variance and a delisting procedure. You will be kept advised of these efforts.

Thank you for your cooperation and guidance in the handling of this matter. If you need any further information or if any questions arise, please contact the undersigned.

Sincerely yours,

CLARK OIL & REFINING CORPORATION

[Signature]
John T. Bernbom
Director of Environmental Control

JTB/dlg

Enclosure

copy to Clifford Gould

RECEIVED

FEB - 8 1990

IEPA-DLPC

95081000455

GUIDE AND PLAN FOR (ALLEGED) STORAGE FACILITY S01 CLOSURE

Planned Closure Date for S01

The planned date for closure will begin within the calendar year 1990.

Pre-Closure

The IEPA will be notified 45 days prior to the start of final closure for the S01 facility. At which time a formal closure plan will be drafted and submitted to the IEPA for approval.

Closure

Approximately 8 cubic yards of leaded tank bottoms was the maximum and only amount of material stored at the facility. All leaded tank bottoms were disposed of in accordance with applicable rules and regulations.

The storage container was a "roll off" style disposal box with a plastic lined interior and cover.

The soil from the immediately area where the disposal box was positioned was sampled and analyzed. A determination of complying with regulated concentration limits will be based on stated limits and/or background concentrations. Clean-up procedures will be based on all sampling and analytical results. A Registered Professional Engineer will review all actions, procedures and data.

Clark will provide a financial test and corporate guarantee for closure.

All closure proceedings will be completed within 90 days from the date of notification of closure plan approval from the IEPA.

Post Closure

After closure procedures are completed the Registered Professional Engineer will submit a Certification of Closure to the IEPA for approval.

CLOSURE COST ESTIMATE FOR (ALLEGED) STORAGE FACILITY S01

Laboratory Analyses	\$ 7,500
Labor.....	\$ 2,000
Disposal.....	\$12,000
Transportation.....	\$ 2,000
Inspection.....	\$ 2,000
Independent Professional Engineering...	\$ 5,000

Total Estimated Cost

\$30,000

95061000457

C605

P 681208634

file



Illinois Environmental Protection Agency

2200 Churchill Road, Springfield, IL 62706

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

October 11, 1985

Clark Oil & Refining Corp.
131st and 4th Avenue
Blue Island, IL 60406-9907

Re: Closure Plan Review

Facility Name: Clark Oil & Refining Corp.USEPA ID #: IL00051098221010240005

Dear Sir:

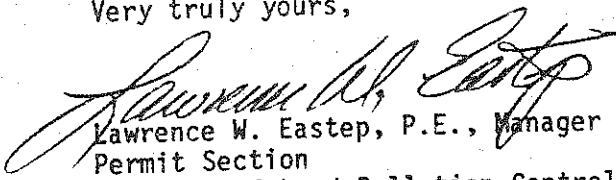
As you are aware, we are currently evaluating the request for closure of your facility as referenced above, and which is regulated under the Resource Conservation and Recovery Act (RCRA).

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the Amendments) were enacted to amend RCRA. Under Section 206 and Section 233 (copies enclosed) of the Amendments, all facilities "seeking a permit" (taken to mean interim status facilities) must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the Unit. Please note that both hazardous and non-hazardous wastes can meet the definition of solid waste under 40 CFR 261.2.

Consequently, we must determine whether such releases have ever occurred at the facility site. If they have, we must ensure that any necessary corrective actions either have been taken, or will be taken, pursuant to a decision on your closure plan. An important part of our determination includes your willingness (or unwillingness) to complete the enclosed certification form. Please read it carefully, complete it, and either sign and return it, or return it to us unsigned with a cover letter of explanation, within 30 days of the date of this letter. Public notice of your request for closure approval, and this request, will be in a newspaper of general circulation in the area of the facility.

Please call Permit Section at 217/782-6762 if you have any questions, or wish to discuss this matter further.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:CA:tk:5/2/9

Enclosures

cc: David A. Stringham, USEPA - Region V
Permit Section
Division File

C605
gabriel laboratories, ltd.
Environmental & Energy Services

1421 North Elston Ave.
Chicago, Illinois 60622
Phone (312) 486-2123
Fax (312) 486-0004

Refer to: 0310240005 - Cook County
Clark Oil and Refining Corporation
ILD005109822
RCRA Part A

October 28, 1991

Mr. Lawrence W. Eastep, P.E., Manager
Illinois Environmental Protection Agency
Permit Section
Division of Land Pollution Control
P.O. Box 19276
Springfield, IL 62794-9276

RECEIVED

OCT 30 1991

IEPA-DLPC

Dear Mr. Eastep:

Gabriel Laboratories, Ltd. has been retained by Clark Oil & Refining Corporation to assist them in the partial closure of one of their hazardous waste management units located at their facility on 131st and Kedzie Avenue, Blue Island, IL 60406-9998.

The partial closure is being conducted so that Clark Oil & Refining Corporation may apply for the withdrawal of the Part A Application associated with this facility. Although the Part A Application lists them as a treater and storer of hazardous waste, Clark recognizes these designations as erroneous and they will be addressed in their request for withdrawal of the Application. Clark maintains that they have not engaged in the storage, treatment or disposal of hazardous waste since the implementation of the RCRA system. However, Clark will remain a generator-only of hazardous waste.

Attached is a Partial Closure Plan for the subject facility and in particular a K052 roll-off box which the IEPA believes was stored at the site for more than 90 days during 1981. Although Clark cannot officially verify that the accumulation time was less than 90 days, they cannot verify that the time was greater than 90 days. The sampling procedures described in this report were performed by Clark Oil & Refining Corporation based upon suggestions made by Mr. Clifford Gould of the Illinois Environmental Protection Agency, Maywood, IL.

It should be noted that Clark will continue to pursue their request for an extension of the 90 day accumulation limit for the storage of hazardous waste. Affixed to the Partial Closure Plan as Attachment G is the correspondence between Clark and the U.S.EPA regarding this issue.

2605

gabriel laboratories, ltd.

Environmental & Energy Services

*Why partial if they plan
on withdrawing their Part A?*

PARTIAL CLOSURE PLAN

for

CLARK OIL & REFINING CORPORATION
131st and Kedzie Avenue
Blue Island, Illinois 60406-9998

Prepared by

Gabriel Laboratories, Ltd.
1421 North Elston Avenue
Chicago, Illinois 60622

RECEIVED

OCT 30 1991

IEPA-DLPC

Submitted on 10/28/91 by:

Gabriel Laboratories, Ltd.

Mark A. Kuklinski

Mark A. Kuklinski
Project Manager

Approved by:

Frank J. Pokorny

Frank J. Pokorny
Registered Professional Engineer

Associate
Gabriel Laboratories, Ltd.

gabriel laboratories, ltd.

Environmental & Energy Services

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Attachments

- A. Part A Application (EPA Form 3510-1 and 3510-3)
- B. USGS Topographical Map and Facility Maps
- C. Detailed Drawing of Hazardous Waste Management Unit
- D. Chronology
 - Gulf Coast Laboratories Analytical Report
 - Chemical Waste Management Inc. - Waste Profile Sheet
 - IEPA Disposal Permit
 - IEPA Waste Manifest # 0367821
- E. Map of Closure Sample Locations
- F. Analytical Closure Report - Gulf Coast Laboratories
- G. Correspondence With U.S.EPA - Extension Request

VII. Inventory of Hazardous Waste

With the exception of the possibility that leaded tank bottoms (K052) were stored at Clark for greater than 90 days, Clark Oil & Refining Corporation claims that they have not engaged in the storage, treatment or disposal of hazardous waste since the implementation of the RCRA system.

With the ultimate goal of the withdrawal of Clark's Part A Application, Clark will assume that eight cubic yards of leaded tank bottoms, (K052) were stored in an elevated, lined and covered steel roll-off box near Tank #801 for more than 90 days.

Attachment D contains a chronology regarding the roll-off box, in addition to the Gulf Coast Laboratories analytical report from the subject leaded tank bottoms, Chemical Waste Management, Inc. - Waste Profile of the same, IEPA Disposal Permit for the leaded tank bottoms and the IEPA Waste Manifest # 0367821 indicating that the subject material was properly disposed at CID/Chicago Landfill. As indicated by the Gulf Coast Laboratories report, the leaded tank bottoms (K052) stored in the roll-off box did not exhibit the characteristics for which it was listed.

VIII. Schedule For Closure

On November 3, 1981, leaded tank bottoms, (K052) which were generated at Clark Oil & Refining Corp., were disposed of at a permitted off-site disposal facility. Although reports filed during this time indicate that no leaking had occurred from the roll-off box, allegations have been made that this material may have been stored on the subject site for more than 90 days, thus constituting the need for formal closure of the site.

Subsequently, in 1982 Clark Oil & Refining Corporation sought to withdraw their Part A Application since they did not engage in the treatment, storage or disposal of hazardous waste and they were only a generator of hazardous waste. Information gathered by Clark indicated that the reason the Part A withdraw had not been granted was due to the issue over the storage of leaded tank bottoms for more than 90 days.

In order to verify that no leaking or spillage had occurred from the steel roll-off box in which the waste was stored, on 1/27/88 three samples were collected in the area of the box (see attachment E). The samples were analyzed by Gulf Coast Laboratories, Inc. and the results were disclosed in a formal analytical report dated February 11, 1988 (see Attachment F).

IX. Air Emissions

Not applicable to this case.

X. Personnel Safety and Fire Prevention

Not applicable to this case.

XI. Decontamination of Tanks, Structures and Soils

Not applicable to this case. *What about the roll off box?*

XII. Soil Cleanup Levels

The subject leaded tank bottoms (K052) discussed in this report were contained within a plastic lined and covered, steel roll-off box, thus greatly minimizing the potential for release into the environment.

The results of the EP Toxicity test performed on the soil samples collected from the roll-off box area indicates that no leachable lead was present in these samples, therefore, no remedial actions were performed.

XIII. Sampling Plan and Analytical Methods

The subject leaded gasoline tank bottoms were stored inside a lined, covered and elevated roll-off box measuring 20' L x 6' W x 4' D. This steel box was located southwest of Tank #801 and was located within an approximately 245' x 305' tank area encircled by a diked wall.

Based upon the suggestions of Mr. Clifford Gould of the IEPA, *Maywood Region* sampling was conducted in January 1988 in the area where the roll-off box had been stored. A random selection of four locations was completed and composite samples were made at three depths: i) sample A, six inches; ii) sample B, twelve inches; and iii) sample C, eighteen inches. As indicated in the report, all samples were analyzed in accordance with the EPA methods listed in SW-846.



Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Refer to: 0310240005 -- Cook County
Clark Oil and Refining Corporation
ILD005109822
RCRA Closure

March 28, 1988

Mr. John T. Bernbom
Director of Environmental Control
Clark Oil and Refining Corporation
131st and Kedzie Avenue
Post Office Box 297
Blue Island, Illinois 60406

Dear Mr. Bernbom:

This is in response to your request dated March 3, 1988 that a provisional variance be granted under 35 Ill. Adm. Code 722.134 for the period October 4, 1981 to November 3, 1981.

This request cannot be granted for the following reasons:

1. Section 722.134(d) did not become effective until May 1982. Therefore, in October 1981 a variance could not have been granted under 35 Ill. Adm. Code 722.134(b).
2. The provisional variance mechanism was not included in 722.134(b) until December 2, 1986.
3. The Pollution Control Board generally does not issue variances for past violations.

A request to withdraw your facility's Part A application should be submitted only after the container storage area is certified closed according to an Agency approved closure plan.

RECEIVED

MAR 31 1988

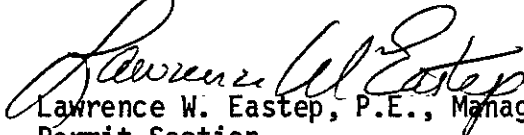
CLARK OIL REF.
BLUE ISLAND, IL.



Page 2

Should you have any questions regarding this matter please contact Amy Dragovich at 217/782-6762.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:ALD:bjh/0826j/59,60

cc: Maywood Region
Compliance Section
USEPA V - Jim Mayka
USEPA V - Mary Murphy
USEPA V - Art Kawatachi
Division File - Closure
Amy Dragovich

file
August 2, 1983

Mr. Andrew Vollmer
Illinois Environmental Protection
Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

Re: Blue Island Refinery
ILD005109822

Dear Mr. Vollmer:

This letter is in response to recent correspondence from Mr. Kuykendall, received on July 28, 1983.

Please be advised that Clark Oil & Refining Corporation does not store, treat or dispose of hazardous wastes. As a result, we believe that the financial assurance requirements are not applicable.

We recognize that Clark has Interim Status to store, treat and dispose. By the enclosed correspondence to USEPA, we are requesting that this status be modified.

Sincerely,

John T. Bernbom
Director of Environmental Control

Enclosure

cc: USEPA

cel

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